Meeting Minutes Transmittal

CENTRAL WASTE COMPLEX
Project Managers Meeting/Part B Workshop
2430 Stevens Center, Room 131
Richland, Washington

August 13, 1997
8:00 a.m. to 12:00 p.m.

The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above-dated Project Managers Meeting.

Joseph J. Waring, Program Manager, DOE-RL — Date: 9/15/97

Ted A. Wooley, Unit Manager, for Laura Cusack, Project Manager, Washington State Department of Ecology — Date: 9/15/97

Anthony G. Miskho, Contractor Representative, FDH — Date: 9/15/97

Daniel G. Saueressig, Permitting Representative, WMH — Date: 9/15/97

Central Waste Complex, WMH Concurrence

Kent M. McDonald, Contractor Representative, WMH — Date: 9/15/97

Purpose: Discuss permitting process.

Meeting Minutes are attached. The minutes are comprised of the following:
Attachment 1 - Agenda
Attachment 2 - Summary of Discussion and Commitments/Agreements
Attachment 3 - Attendance List
Attachment 4 - Action Items
Attachment 5 - Notice of Deficiency Response Table with Agreements/Actions Resulting from Part B Workshop

Attachment 1

CENTRAL WASTE COMPLEX
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AGENDA

1. **PREVIOUS MEETING MINUTES**

2. **PERMIT APPLICATION STATUS**

   - Part B NOD Workshop Schedule (D. Saueressig - WMH)

3. **BUDGET TOPICS**

   - FY97 Budget Status (D. Saueressig - WMH)

4. **CONTAINERS RECEIVED FROM ARGONNE NATIONAL LABORATORY**

5. **CONVERSION OF BUILDING 2401-W FROM PART OF TSD UNIT TO 90 DAY ACCUMULATION AREA**

6. **GENERAL TOPICS**

   - Past Action Items

3-21-96:3	Check to see if there is some type of quantifiable criteria by which CWC personnel determine whether a spill is major or minor. ACTION: Mr. Miskho **OPEN**
5-31-96:2	WMH will provide Ecology (T. Wooley) the comparison between the unit specific BEP versus the Hanford Contingency Plan(s) at the next PMM. ACTION: Mr. Miskho **OPEN**
11-12-96:1	Mr. Wooley, (Ecology) will provide Mr. McKarns (DOE-RL), Mr. Saueressig (WMH) and Mr. Miskho (FDH) an outline of the detail he is requesting to be included in the Building Emergency Plan. ACTION: Mr. Wooley **OPEN**
11-12-96:2	Mr. Miskho (FDH) will determine a course of action in an effort to provide a Building Emergency Plan to meet Ecology's approval. ACTION: Mr. Miskho

OPEN

12-11-96:1 Mr. Barnes (WMH) will establish a time for Mr. Wooley (Ecology) to observe an emergency exercise at CWC.
ACTION: Mr. Barnes

OPEN

- New Action Items

7. **SCHEDULE NEXT MEETING**

- Tentative Date

8. **PART B WORKSHOP**

Attachment 2

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Summary of Discussion and Commitments/Agreements

1. PREVIOUS MEETING MINUTES

The July 9, 1997 Project Manager Meeting (PMM) minutes will be presented at the September 1997 PMM for approval and signature.

2. PERMIT APPLICATION STATUS

- Part B NOD Workshop Schedule

  Mr. D. Saueressig (WMH) stated that a workshop will follow the PMM, and the parties are on schedule for revision of the Part B Permit Application.

3. BUDGET TOPICS

- FY97 Budget Status

  Mr. Saueressig stated that the CWC Part B Permit Application is still funded for FY '97.

4. CONTAINERS RECEIVED FROM ARGONNE NATIONAL LABORATORY

Mr. K. McDonald (WMH) provided an update regarding the 352 containers received from Argonne National Laboratory in 1993. Four containers from each of the two waste streams were sent to T Plant to be RTR'd (radioactive realtime radiography). All eight of the containers had void spaces at the top, which indicates the bulging is due to gas generation. The containers were punctured and flammable gases were detected, and it is assumed the gas is methane. The eight containers were overpacked in vented containers.

A certain percentage of the remaining containers will be RTR'd. WMH plans to vent and overpack all of the containers with Nucfil filters, unless gas sampling during venting reveals a large number of containers do not contain flammable gas. In that case, WMH will reevaluate the path forward for those containers. The goal is to RTR and disposition all of the containers by the end of FY '97.

Mr. T. Wooley (Ecology) asked if venting the containers is considered a short- or long-term fix. Mr. McDonald responded that the venting process should be a long-term fix. Mr. McDonald explained that the vent

breathes both ways, which allows air in the overpack container. The air creates aerobic decay (CO2), which is not a problem in small amounts. The air will also dry out any moisture and stop decay. Mr. Wooley requested justification that venting and overpacking is an appropriate method of disposition for the containers. Mr. McDonald noted that the permanent fix is to treat the containers to meet Land Disposal Restrictions (LDR) and dispose of the containers.

Mr. Wooley asked if methane is the sole gas generated. Mr. J. Ahlers (WMH) explained that two different type of detectors were used. The results were a high probability the gas is methane; however, the results aren't 100 percent conclusive, due to decomposition of other products.

Mr. Wooley expressed concern regarding the use of corncobs as packing material. Mr. Ahlers stated that the waste stream packed with corncobs showed little or no bulging. Mr. R. Ames (WMH) added that the organic material was already in the containers and not a result of a breakdown of the corncobs.

Mr. Wooley inquired about validation of the inventory paperwork from Argonne. Mr. McDonald stated that the generator services group is requesting details of analytical results from Argonne in an effort to validate the paperwork. Mr. Wooley stated that Ecology plans to review Argonne's paper trail.

Mr. B. Wilson (Ecology) asked when the containers were received from Argonne. Mr. McDonald stated that the drums were received in late 1993, early 1994, and the containers were not received under the Waste Specification System. Mr. Wilson inquired about the acceptance criteria in place at the time the containers were received from Argonne. Mr. McDonald indicated that off-site generator assessment was the procedure at the time, and that the waste acceptance criteria used was contained in WHC-CM-0063. Mr. Wilson referred to past Hanford off-site generator assessments that were insufficient to meet verification requirements, and he expressed an interest in reviewing the generator assessments performed on the containers from Argonne. Mr. N. Emerson (WMH) took an action to provide the off-site generator assessments to Ecology.

Mr. Wilson referred to an information paper from Argonne, which stated that as long as the waste met the Hanford waste acceptance criteria when it was received, that the generator relinquishes future liability for the waste. **NOTE: The generator cannot relinquish future liability for waste that they generated. They are responsible for their waste from cradle to grave.** Mr. Wilson asked if there has been any follow-up regarding liability for managing the containers. Mr. J. Waring (DOE-RL) stated that a discussion he had with DOE Headquarters has indicated that Argonne will pay for the corrective action.

Mr. Wilson referred to the void spaces observed during RTR of the eight containers, and asked if it was due to settling or if the void space would not have been considered as part of Hanford's waste acceptance criteria at the time the containers were received. Mr. McDonald explained that the void space is approximately six inches from the top,

which is normal for filling a container. Mr. Wilson asked if any anomalies from the waste stream description were noted during RTR. Mr. Ahlers responded that RTR confirmed what was indicated on the paperwork. Mr. Ahlers added that the intent is to ensure the bulging is caused by gas generation and not by solids expansion, and that RTR of the eight containers has confirmed gas generation.

Mr. Wilson inquired about the information provided when the waste was received from Argonne. Mr. McDonald responded that the information provides the components of the waste, what the hazardous constituents are, and the radioactive characterization.

Mr. Wilson inquired about the RTR of the remaining containers. Mr. Ahlers stated that the five percent verification rate will be applied to the containers at T Plant. Mr. Wilson asked if five percent is consistent with the bulging containers. Mr. Ahlers indicated it was consistent with the current verification program. Mr. Wilson asked about application of the performance evaluation system associated with the verification rates. Mr. McDonald explained that if the containers fail RTR, then the verification percentage rate would be raised. Further discussion ensued regarding waste acceptance criteria, verification, and the performance evaluation system. Mr. Wilson expressed his concern regarding storage of off-site containers accepted under inadequate acceptance criteria.

Mr. Wooley requested a copy of the work plan for disposition of the Argonne containers.

5. CONVERSION OF BUILDING 2401-W FROM PART OF TSD UNIT TO 90 DAY ACCUMULATION AREA

Mr. Saueressig reported that internal meetings are still being held. Mr. Saueressig stated that a separate meeting will be set up with Ecology to discuss the issue, and then a status will be provided at the PMM.

6. GENERAL TOPICS

- Past Action Items

  3-21-96:2, Check to see if there is some type of quantifiable criteria by which CWC personnel determine whether a spill is major or minor.

  This action item was left open.

  5-31-96:2, WMH will provide Ecology (T. Wooley) the comparison between the unit specific BEP versus the Hanford Contingency Plan(s) at the next PMM.

  This action item was left open.

11-12-96:1, Mr. Wooley, (Ecology) will provide Mr. McKarns (DOE-RL), Mr. Saueressig (WMH) and Mr. Miskho (FDH) an outline of the detail he is requesting to be included in the Building Emergency Plan.

This action item is open.

11-12-96:2, Mr. Miskho (FDH) will determine a course of action in an effort to provide a Building Emergency Plan to meet Ecology's approval.

This action item was left open.

12-11-96:1, Mr. Barnes (WMH) will establish a time for Mr. Wooley (Ecology) to observe an emergency exercise at CWC.

This action item was left open.

- New Action Items

The following actions were generated: 1) WMH will provide Ecology justification for disposition of the bulging Argonne containers by venting/overpacking; 2) WMH will provide Ecology the off-site generator assessment that was performed on the Argonne containers and Argonne's container summary sheets ; 3) WMH will provide Ecology an estimate of the number of off-site containers that are stored at CWC, with a breakdown of the waste (organic) and potential problems with long-term storage.

7. SCHEDULE NEXT MEETING

- Tentative Date

The next PMM was tentatively scheduled for September 10, 1997, in Richland, Washington.

- Proposed Topics

Proposed topics may be submitted to Mr. Saueressig.

8. PART B WORKSHOP

The remainder of the workshop was dedicated to resolving specific comments Ecology has with draft CWC Part B.

Attachment 3

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Project Managers Meeting/Part B Workshop
2430 Sevens Center, Room 131
Richland, Washington

August 13, 1997
8:00 a.m. to 12:00 p.m.

Attendance List

Name	Organization	Phone #
Ted Wooley	Ecology	736-3012
Mike Ciminera	GSSC	946-3681
Randy Ames	WMH	373-2067
Kathy Knox	Knox Court Reporting	946-5535
Dan Saueressig	WMH	376-9739
Kent McDonald	WMH	373-4981
Norm Emerson	WMH	372-0828
Larry Olsen	WMH	376-8737
Tony Miskho	FDH	376-7313
Jeff Ahlers	WMH	373-5067
Bob Wilson	Ecology	736-3031
Joe Waring	DOE-RL	373-7687
Tony McKarns	DOE-RL	376-8981

Attachment 4

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August 13, 1997
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Action Items

Action Item #	Description
3-21-96:3	Check to see if there is some type of quantifiable criteria by which CWC personnel determine whether a spill is major or minor. ACTION: Mr. Miskho (FDH) **OPEN**
5-31-96:2	WMH will provide Ecology (T. Wooley) the comparison between the unit specific BEP versus the Hanford Contingency Plan(s) at the next PMM. ACTION: Mr. Miskho (FDH) **OPEN**
11-12-96:1	Mr. Wooley (Ecology) will provide Mr. McKarns (DOE-RL), Mr. Saueressig (WMH) and Mr. Miskho (FDH) an outline of the detail he is requesting to be included in the Building Emergency Plan. ACTION: Mr. Wooley (Ecology) **OPEN**
11-12-96:2	Mr. Miskho (FDH) will determine a course of action in an effort to provide a Building Emergency Plan to meet Ecology's approval. ACTION: Mr. Miskho (FDH) **OPEN**
12-11-96:1	Mr. Barnes (WMH) will establish a time for Mr. Wooley (Ecology) to observe an emergency exercise at CWC. ACTION: Mr. Barnes (WMH) **OPEN**

08-13-97:1 WMH will provide Ecology justification for disposition of the bulging Argonne containers by venting/overpacking.
ACTION: Mr. McDonald (WMH)

OPEN

08-13-97:2 WMH will provide Ecology the off-site generator assessment that was performed on the Argonne containers and Argonne's container summary sheets.
ACTION: Mr. Emerson/Mr. G. Triner (WMH)

OPEN

08-13-97:3 WMH will provide Ecology an estimate of the number of off-site containers that are stored at CWC, with a breakdown of the waste (organic) and potential problems with long-term storage.
ACTION: Mr. McDonald (WMH)

OPEN

Attachment 5

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August 13, 1997
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NOTICE OF DEFICIENCY RESPONSE TABLE
WITH AGREEMENTS/ACTIONS RESULTING
FROM PART B WORKSHOP

March 21, 1997

Hanford Facility Dangerous Waste Permit Application,
Central Waste Complex DOE/RL-91-17 WD2
Notice of Deficiency Table No. 1

No.	Comment/Requirement

1. Page 1-1, line 17. Comment: It is not clear why the Part A, form 3s for the Central Waste Complex (CWC) and Waste Receiving and Processing (WRAP) were combined.

   Requirement: Clarify this part of the discussion.

   DOE-RL/FDH Response: They are not combined, and were split into two separate Form 3's on January 25, 1995 (Revision 3). Originally the Hanford Central Waste Complex (Hanford CWC) Part B included the Radioactive Mixed Waste Storage Facility (now known as CWC), and the Waste Receiving and Processing Modules 1, 2A, and 2B. The TPA identified two Part B's for this one unit, and two distinct milestones for submittal of the Radioactive Mixed Waste Storage Facility Part B (Milestone M-20-05) and the Waste Receiving and Processing Module 1 [Module 2A and 2B to be included as revisions to the WRAP Part B (Milestone M-20-12)]. A decision was made to separate the Part A into two separate Part A's to match the Part B's.

CLOSED (6/4/97)

2. Page 1-1, line 20. Comment: Ecology's review of the most recent CWC Part A, form 3, REV 3 against REV 4 did not identify an additional 23 waste codes. Please identify which codes were added. If REV 4, dated 10/01/96, is not the most current CWC Part A, the U.S. Department of Energy (USDOE) will need to resubmit the currently active Part A and, if there are significant changes, re-certification may have to take place.

   Requirement: Explain how the addition of 23 waste codes was justified and to which Part A revision.

DOE-RL/FDH Response: The 23 additional dangerous waste numbers were added to Revision 3 of the Part A, Form 3. Comparison of Revision 2 against Revision 3 will identify waste numbers that were added. No comments were received from Ecology on Revision 3, therefore Revision 3 was approved. As the Washington Administrative Code (WAC) 173-303 is revised, dangerous waste numbers are added and/or deleted from the regulations. Therefore, when the Part A was revised, these dangerous waste numbers were either added or deleted to reflect the current revision of WAC 173-303. Revision 4 (included in this draft permit application) is the most current version and was submitted when the Project Hanford Management Contract was awarded to Fluor Daniel Hanford, Inc.

CLOSED (7/9/97)

3. Page 2-1, Section 2.0. Comment: Ecology's Dangerous Waste Permit Application Requirements document, sections B-1a(2) and (3) have not been addressed. Items, such as a detailed flow diagram description of the dangerous waste management operations and any Dangerous Waste Regulations regarding "treatment by generator," are missing from this section.

   Requirement: Review the permit application requirements, as referenced above, and revise the Part B accordingly.

   DOE-RL/FDH Response: ~~Per the Ecology Part B checklist [B-1a(2)],~~ this information is referenced and discussed in Chapters 3.0 and 4.0 and Appendix 3A per the Ecology Part B checklist [B-1a(2)] guidance that duplicate information is not required. ~~This draft permit application was developed before the Waste Analysis Plan (WAP) guidance was finalized.~~ The WAP will be revised before the next submittal to incorporate the guidance. Treatment by generator activities are outside the scope of this permit application.

OPEN PENDING REVIEW OF WASTE ANALYSIS PLAN AND DISCUSSION ON POINT OF GENERATION (E.G., SPILL CLEANUP [POG: y], REPACKAGING [POG: ?], AND MOVEMENT OF CONTAINERS [POG: N]) (6/4/97). MORE DETAIL ON TREATMENT WILL BE INCLUDED IN THE WASTE ANALYSIS PLAN AND CHAPTER 4.0. A DETAILED FLOW DIAGRAM OF THE WASTE ACCEPTANCE PROCESS WILL BE INCLUDED IN THE WASTE ANALYSIS PLAN (7/9/97).

4. Page 2-1, line 51. Comment: The sentence beginning with, "The floor accommodates a 908-Kg forklift ... and an approximate 1000, container equivalent load, depending on the waste management criteria," is confusing. What is a 1000 container equivalent load? Also, what does discussion on floor load capacity have to do with waste management criteria?

   Requirement: Please revise\clarify this sentence with the above questions being the basis for revision.

   DOE-RL/FDH Response: A 1,000 container equivalent load is equivalent to 1,000 208-liter containers full

of water. For example, using the weight of water, which is approximately 1 kilogram per liter, therefore, a 208-liter container could weigh as much as 208 kilograms, when multiplied by 1,000, you arrive at a 1,000 container equivalent load of 208,000 kilograms, which these storage buildings are rated for. With regards to the 908 kilogram forklift, this discussion is for informational purposes only. The only intent behind the statement commented on is to demonstrate that the floor is capable of accommodating a given waste load in conjunction with waste handling equipment.

CLOSED (6/4/97) - THE TEXT OF SECTION 2.1.1 HAS BEEN MODIFIED AS FOLLOWS: "The floor accommodates a 908-kilogram forklift and an approximate 1,000 container equivalent load, ~~depending on waste management criteria~~not to exceed the floor loading limit of. ~~The floor loading is limited to~~ 0.22 kilogram per square centimeter."

5. Page 2-2, line 22. Comment: What type and magnitude of module modification does it take to facilitate modification of the Part A. As the text reads now, there could be a lot of changes to the modules with little or no revision to the CWC Part A.

   Requirement: Provide further information on the process.

   DOE-RL/FDH Response: Correct. The CWC is constructed and continues to accommodate construction for the addition of storage locations as waste management needs dictate. The Part A description allows for the flexibility to modify existing storage locations without a revision. The process design capacity identified in Section III.B.1. of the Part A is large enough to accommodate any new storage locations without an increase, however, the Part A would be revised whenever new storage locations outside the TSD unit boundary are identified as being needed.

CLOSED (7/9/97).

6. Page 2-3, line 9. Comment: Please see comment/requirement #4 above.

   DOE-RL/FDH Response: Refer to response to comment 4.

CLOSED (6/4/97) - SAME RESPONSE AS COMMENT 4.

7. Page 3-1, Section 3.1. Comment: Although the reference to the Dangerous Waste Application Requirements is correct, the section does not fulfill the prescribed elements laid out in C-1 and C-1(a). C-1(a) stipulates the following: "Include the identity and concentration of all constituents and physical properties . . . "

   Requirement: Clarify how the text presented in section 3.1 meets the elements of C-1 and C-1(a).

DOE-RL/FDH Response: This draft permit application was developed before the WAP guidance was finalized. The WAP will be revised before the next submittal to incorporate the guidance.

8. Page 3-1, line 14. Comment: This sentence identifies mixed waste as being the only type of waste that can be stored in CWC. Does this mean there is absolutely no "non-mixed" dangerous waste currently stored at CWC?

Requirement: Provide information to answer the above question.

DOE-RL/FDH Response: The CWC can accept any type of waste, however, for the purpose of this Part B, mixed waste and only the dangerous waste portion of that mixed waste (excluding radionuclides) is subject to Ecology regulation. The CWC also can store low-level waste and transuranic waste and this waste is not subject to Ecology regulation. The CWC mission supports these waste management activities. This draft permit application was developed before the WAP guidance was finalized. The WAP will be revised before the next submittal to incorporate the guidance.

9. Pages 4-1, line 48. Comment: This paragraph does not mention "state only" waste codes WSC2 and W001. Is this list meant to be comprehensive or not?

Requirement: Please explain why the two waste codes mentioned above are not listed under section 4.1.1.1.

DOE-RL/FDH Response: Accept, dangerous waste numbers WSC2 and W001 will be added.

CLOSED (8/13/97).

10. Page 4-1, line 46. Comment: The text indicates that marking and labeling requirements are discussed in chapter 3.0, Where?

Requirement: Please identify where these instructions are specifically found in chapter 3.

DOE-RL/FDH Response: Accept. Text will modified as follows and moved to a stand alone section: "Mixed and/or radioactive waste containers are labeled and marked to indicate the dangerous and radioactive characteristics of the waste. The U.S. Department of Transportation (DOT) labels are used as the primary tool to meet major risk(s) labeling requirements in WAC 173-303-630(3). For Class 9 DOT hazardous materials, the "TOXIC" label will be used. For state-only wastes, the hazardous waste label shall be considered the major risk marking. ~~The hazard labels are affixed, as required, to the sides of the containers, and each mixed waste container has a hazardous waste identification sticker attached in accordance with Ecology requirements. Marking and labeling requirements on the waste records are discussed in Chapter 3.0, Section 3.2. In addition to the U.S. Department of Transportation marking and~~

~~labeling requirements, all waste containers are marked as follows:~~

- ~~'PERSISTENT' If a WP01, WP02, or WP03 waste number is applicable~~
- ~~'TOXIC' If a WT01 or WT02 waste number is applicable.~~

~~Containers currently in storage will remain as labeled, unless moved to another Hanford Facility TSD unit. State only waste numbers also are added to containers being moved to another TSD unit.~~"

OPEN (8/13/97) PENDING APPROVAL BY ECOLOGY AND WMH.

11. Page 4-2, Section 4.1.1.2. Comment: Requirement D-1c, although referenced, is not met in this section. Container Labeling is not discussed anywhere in this section.

    Requirement: Please clarify where labeling is described in this section, or where it can be found in the Part B. If it is not currently in the Part B, please add it, pursuant to requirement D-1c.

    DOE-RL/FDH Response: Accept. ~~Text will be added.~~ Container labeling text was inadvertantly place into Section 4.1.1.1. Text located on Page 4-1, lines 42-52, and Page 4-2, lines 1-3, will be moved to a new section 4.1.1.3 in accordance with comment #10 to be consistent with the permit application requirements checklist. Reference to "D-1c" in line 5 of page 4-2 will be removed.

CLOSED BASED ON RESOLUTION OF COMMENT #10 (8/13/97).

12. Page 4-2, line 41. Comment: This section is incomplete. The secondary containment calculations (as noted in Appendix 4C) are not yet available. This requirement must be met during interim status, just as it would be required in final status.

    Requirement: Provide these calculations as soon as possible. The Part B cannot be approved without these calculations completed and inserted into the document.

    DOE-RL/FDH Response: The secondary containment calculations were included in Revision 0. These calculations are currently being converted to metric per a DOE-RL direction, field walkdowns are being performed to verify previous calculations completed from design drawings, and will be provided when completed.

OPEN PENDING COMPLETION OF INFORMAL RL TRANSMITTAL OF REVISED SECONDARY CONTAINMENT CALCULATIONS. RUN-OFF DISCUSSIONS RELATED TO SECTION 4.1.2.2 ARE PENDING (8/13/97).

13. Page 4-3, line 27. Comment: How can sections 4.1.2.2 and 4.1.2.3 be completely accurate if the

secondary containment calculations, as noted in comment #12, are not complete?

Requirement: Explain how discussions provided in sections 4.1.2.2 and 4.1.2.3 are valid without the appropriate calculations completed.

DOE-RL/FDH Response: Refer to response to comment 12. Once the secondary containment calculations are ~~converted to metric~~provided to Ecology, the sections referencing these calculations will be verified.

OPEN PENDING RESOLUTION OF COMMENT #12 (8/13/97).

14. Page 4-4, line 10. Comment: How visually accessible are the trench drains? Can an accurate assessment of the volume contained by the trenches be made?

Requirement: Describe in more detail the visual accessibility of the storage pad trenches.

DOE-RL/FDH Response: The trenches are covered with a grate, the grate has holes, and this grate provides for ocular verification. ~~This verification allows for an estimate of the trench volume to be determined.~~ The dimensions of the trench are known, and the volume of accumulated liquid can be estimated to within 10 percent.

CLOSED (8/13/97).

15. Page 4-4, line 21. Comment: In what building is the logbook kept and what type of release would facilitate a change to the logbook.

Requirement: Please provide answers for the above questions.

DOE-RL/FDH Response: The logbook usually is kept at MO-288 during operating hours. All other times, the logbook is stored in MO-720 in a fire resistant file cabinet (on the waste receiving and staging area). Any release of accumulated water from the Mixed Waste Storage Pad trench is recorded in the logbook regardless of quantity.

OPEN PENDING REVIEW OF RAIN WATER DISCHARGE PERMITTING REQUIREMENTS (8/13/97).

16. Page 4-5, line 26. Comment: Who is responsible for developing a sampling and analysis plan for the wipe sampling events?

Requirement: Revise document to include more detail on the development and implementation of the sampling plan.

DOE-RL/FDH Response: There is no sampling plan for the cleanup of spills. Procedures are in place to clean up spills and to verify the adequacy of the cleanup. Sampling plans are prepared for closure activities, but are not required by WAC 173-303 for spill cleanup.

17. Page 4.-6, line 32. Comment: This sentence is somewhat confusing. The Part A describes solidification of free liquids as a treatment process performed at CWC, yet free liquids are only looked for under specific instructions. Does this mean there is a potential for free liquids to be stored at CWC? If so, how does the Part A reflect this. Of the drums that are stored long term, what percentage of the total drum volume can contain free liquid?

DOE-RL/FDH Response: The CWC meets all regulatory requirements (WAC 173-303) to store free liquids. The Part B will be written to reflect this operating flexibility. Current waste acceptance criteria limit liquids from 1 to 3 nineteen liter leak resistant containers overpacked in a container that contains twice the absorbent amount of material needed to absorb the liquid.

18. Page 4-7, line 16. Comment: This paragraph is insufficient in terms of providing the elements identified in Section D-1f(1). The following direction is given: "Provide sketches, drawings, or data that containers of reactive waste exhibiting a characteristic specified in WAC 173-303-090(7)(vi), (vii) or (viii) are stored in a manner equivalent . . . ," but is not indicated in the text currently in the permit application.

Requirement: Explain why all of the information identified in D-1f(1) is not provided in section 4.3.1. If this information can be found in various portions of the document, please identify those sections. If there are related plan views or as-built sketches, those should be referenced within this section so the reader does not have to search for them. If there are no sketches that apply to reactive waste storage, this requirement will considered as unfulfilled.

DOE-RL/FDH Response: Per the Ecology Part B checklist, this section will be evaluated against what is required by applicable WAC 173-303 regulations.

19. Page 4-7, line 23. Comment: This paragraph is insufficient in terms of providing the elements identified in Section D-1f(2). The following direction is given: "Provide sketches, drawings, or data demonstrating that container storage of ignitable waste and reactive waste." Requirements listed in section D-1f(2) go beyond what the permit language currently includes.

Requirement: Explain why all of the information identified in D-1f(2) is not provided in section 4.3.2. If this information can be found in various portions of the document, please identify those sections. If there are related plan views or as-built sketches, those should be referenced within this section so the reader does not have to search for them. If there are no sketches that apply to reactive waste storage, this requirement will be considered as unfulfilled.

DOE-RL/FDH Response: Per the Ecology Part B checklist, this section will be evaluated against what is required by applicable WAC 173-303 regulations.

20. Page 4-7, line 32. Comment: This paragraph is insufficient in terms of providing the elements identified in Section D-1f(2). The following direction is given: "Through sketches, drawings, and/or data demonstrate that a container holding a dangerous that is compatible with any waste . . .." Requirements listed in section D-1f(3) go beyond what the permit application language currently includes.

Requirement: Explain why all of the information identified in D-1f(3) is not provided in section 4.3.3. If this information can be found in various portions of the document, please identify those sections. If there are related plan views or as-built sketches, those should be referenced within this section so the reader does not have to search for them. If there are no sketches that apply to reactive waste storage, this requirement will consider as unfulfilled.

DOE-RL/FDH Response: Per the Ecology Part B checklist, this section will be evaluated against what is required by applicable WAC 173-303 regulations.

21. Page 6-2, line 8. Comment: Section F-2 in the requirements is actually entitled, "Inspection Plan," not "Inspection Requirement." What process does CWC have that would be considered equivalent?

Requirement: Explain how WAC-173-303-806 (4)(a)(v), -303-320, -303-340, 40CFR 270.14, and 264.15 are being met within this section, or even within the permit application.

DOE-RL/FDH Response: This information is contained in Sections 6.2.1, 6.2.1.1, 6.2.1.2, 6.2.2, 6.2.3 and 6.2.3.1 and 6.2.3.2.

22. Page 6-2, line 24. Comment: There is no apparent attempt in this section to meet requirement F-2a(1).

Requirement: Please review the elements identified in F-2a(1) and describe how these are met with the permit application.

DOE-RL/FDH Response: The Ecology Part B checklist is guidance and not everything contained is required by the regulations.

23. Page 6-2, line 24. Comment: It would be helpful to get a copy of a blank inspection checklist, in order to better understand what is actually looked for on a standard inspection

Requirement: Please provide a copy.

DOE-RL/FDH Response: Checklist is available at the TSD unit and one will be provided. However, the checklist will not be included in the Part B as inclusion is not required by WAC 173-303.

24. Page 6-3, Line 35. Comment: F-2c(1)(c) requires specifying actual timelines for taking corrective action. Line 35 of Section 6.2.2 of the permit application defers discussion of the timeline to the BEP (appendix 7a). The BEP does not indicate a timeline for corrective action.

Requirement: Revise either section 6.2.2 and\or the BEP pursuant to F-2c with regard to all spill types. Please emphasize timeline for corrective actions and positions responsible for taking corrective action or ensuring other staff remedy the problems. If this information is already available, please identify where it exists. Further discussion on adequacy of the information with regard to regulatory requirements will most likely be necessary.

DOE-RL/FDH Response: The Ecology Part B checklist is guidance and not everything contained is required by the regulations.

25. Page 6-4, line 15. Comment: This section refers the reader to section 6.2.2, which refers the reader to the BEP for corrective actions other than spills to secondary containment. As discussed in comment #24, the BEP does not adequately address corrective action schedules.

Requirement: Please see requirement #24 with focus on F-2d(1)(b)(i) and (ii).

DOE-RL/FDH Response: Refer to response to comment 24.

26. Page 7-1. Comment: Currently, Ecology is having internal discussions on whether the combination of unit specific BEP and Attachment 4 of the Hanford Facility Permit (DOE/RL 91-28) plus other documents, such as, the plant operating procedures and WHC-CM-4-43 actually make up an effective "overall contingency plan." The main questions Ecology has at this time is: (1) When do USDOE and contractors actually consider the BEP implemented, and (2) what does that mean in terms of reporting requirements? Additional NODs will results from that discussion.

Requirement: Please prepare for future discussions on how the combination of all of the documents actually fulfill requirements pursuant to WAC 173-303-350.

DOE-RL/FDH Response: No response required. Answers to questions will be developed during future discussion with Ecology.

27. Page 10-1. Comment: There is no mention of intent to meet 40 CFR 264.75(h) and (~~i~~i) requirements. A quick review of DOE/RL-97-16, the Hanford Site Annual Dangerous Waste Report, indicates some deficiencies. Generator identification is lacking in most cases and there is no mapping of waste location as required in 40 CFR.

Requirement: Review the federal requirements. Revision of -97-16 or Section 10 of the permit application will be necessary.

DOE-RL/FDH Response: The requirements of 40 CFR 264.75(h) and (i) are not met through the Part B Permit Application requirements but through reporting mechanisms outside of the Hanford Facility RCRA permit. The waste minimization requirements are contained in the HSWA portion of the Hanford Facility RCRA Permit, Condition II.F and only address the certification requirement of 40 CFR 264.73(b)(9). There is no need to include information regarding 40 CFR 264.75(h) and (i) in the CWC portion of the Hanford Facility Part B Permit Application. This text has been agreed to by Ecology and is reflected in the *Hanford Dangerous Waste Permit Application, General Information Portion* (DOE/RL-91-28), Chapter 10.

OPEN (6/4/97) - RFSH WILL PROVIDE ECOLOGY A COPY OF WASTE MINIMIZATION PLAN FOR SOLID WASTE AND A COPY OF THE ANNUAL REPORT THAT IS GIVEN TO THE WASTE MINIMIZATION GROUP. ~~TONY MISKHO WILL PROVIDE ADDITIONAL INFORMATION TO THE DOE-RL/FDH RESPONSE.~~ CLOSED PENDING ECOLOGY REVIEW OF ANNUAL CERTIFICATION IN CWC OPERATING RECORD (7/9/97). LARRY OLSEN WILL PROVIDE A COPY OF THE CWC WASTE MINIMIZATION CERTIFICATION IN THE OPERATING RECORD TO TED WOOLEY (8/13/97).

28. Page 11-2 line 1. Comment: Reference to the background document will require updating. A cross-reference to the appropriate contractor will be necessary, unless some portions of Westinghouse Hanford still exist. If WHC 1991a is the relevant document then Ecology concurrence should have occurred and been documented, or use of it for permitting activities may not be appropriate. Also, sampling requirements imposed by WAC-173-340, as implemented by WAC-173-303, must be considered in corrective action.

Requirement: Revise the permit application to correctly reference the site background document and verify Ecology approval of the document. Also, add the reference to WAC-173-340.

DOE-RL/FDH Response: Refer to the *General Information Portion* (DOE/RL-91-28), Chapter 11.0. The correct sampling methods are identified in SW-846. It is anticipated that the CWC will be clean closed and, therefore, corrective action will not be required. Reference to WHC 1991a will be removed.

CLOSED (6/4/97) - THE TEXT WAS REVISED AS FOLLOWS: "The CWC will be considered clean when the sampling of the

structures and the surrounding soil shows that the concentrations for all constituents of interest are present at concentrations at or below the appropriate background or regulatory thresholds as discussed in the General Information Portion (DOE/RL-91-28, Chapter 11.0, Section 11.1.1.1). ~~Soil background levels will be based on established and accepted Hanford Site soil background information (WHC 1991a) or established by soil sampling per SW-846 (EPA 1986).~~"

29. Page 11-2 line 11. Comment: There is no mention of providing Ecology with a sampling and analysis\decontamination plan as part of the closure requirements. Although this may be implied, it makes sense to actually identify this as a major deliverable prior to implementing closure activities.

Requirement: Revise section 11.1.2 to include an Ecology approved the SAP\decon plan as a preclosure deliverable. The format will be based on the most current Ecology guidance (current to the year that CWC is actually closed).

DOE-RL/FDH Response: The CWC is not anticipated to be closed for a number of decades. When the CWC does close, the current regulatory requirements for development of a closure plan will be followed~~submitted~~.

CLOSED (6/4/97) - THE TEXT WAS MODIFIED AS FOLLOWS: " Any sampling and analysis activities required for clean closure will be accomplished in accordance with a sampling and analysis/decontamination plan that meets the requirements in place at the time of closure.~~Closure will entail random sampling of the soil surrounding the storage and loading areas to verify that no contaminants above background or regulatory thresholds are present at the time of closure. Additionally, authoritative samples will be taken as necessary based on information available at the time of closure.~~"

30. Page 13-1. Comment: WAC-173-340 will require referencing. Also, as stated in the requirements list, all permits applied for or received from any regulatory agencies.

Requirement: Please revise the permit application to meet this requirement under Section J.

DOE-RL/FDH Response: In accordance with the *Hanford Facility Dangerous Waste Permit Application, General Information Portion* (DOE/RL-91-28) Revision 3, Page 13-1 line 30-31, Section 13.0 of the CWC portion will be revised to include the list of applicable laws and requirements. Descriptions of the applicable laws and requriements are found in the *Hanford Facility Dangerous Waste Permit Application, General Information Portion* (DOE/RL-91-28), Section 13.0 and will not be duplicated. ~~This text has been agreed to by Ecology and is reflected in the *General Information Portion* (DOE/RL-91-28), Chapter 13.0.~~

OPEN (6/4/97 AND 7/9/97) - PENDING REVIEW OF LIST PLACED INTO SECTION 13.0. TED WILL REVIEW THE REVISED CHAPTER 13.0 AND DISCUSS WITHIN ECOLOGY (8/13/97).

31. Page APP 3A-i. Comment: A detailed set of NODs on the Waste Analysis Plan (WAP) for CWC will be submitted by Ecology in the coming weeks. There are still some outstanding issues on the WAP guidance that need resolution.

Requirement: An agreement of when Ecology will provide NODs on the WAP will be discussed as part of the work shop schedule at the next project managers meeting.

DOE-RL/FDH Response: A CWC WAP addressing the guidance developed during the workshops with DOE-RL, FDH/RFSH, and Ecology will be developed.

32. Page APP 4C-i. Comment: When will secondary containment calculations be available? The part B cannot be approved prior to having the calculations.

Requirement: Please give a date.

DOE-RL/FDH Response: Refer to response to comment 12. Secondary containment calculations will be provided by July 31, 1997.

33. Page APP 4D-i. Comment: There is no information on how durable the sealant is in terms of reaction to chemical spills and physical damage from drum movement. MSDS information, although necessary, does not whether the sealant is appropriate for the application it is being used for.

Requirement: Revise the permit application, adding the requested information.

DOE-RL/FDH Response: Although the regulations do not require the installation of a protective coating over the concrete floors, this added protection for the concrete exceeds what is required by the regulations. The MSDS's provide general physical and chemical descriptions of the coatings.

34. Page APP 7A-i. Comment: Ecology is not prepared to give a complete set of NODs on the BEP because of current internal discussions.

Requirement: A date will be set for submittal of BEP NODs. NODs were submitted in January 1996 which, at a minimum, will require completed resolution. Additional NODs will be dependent on the outcome of Ecology discussions.

DOE-RL/FDH Response: No response required. Answers to questions will be developed during future discussions with Ecology.

35. Page APP 8A-i. Comment: There is no reference to Section H the Dangerous Waste Application Requirements

document, Why?

Requirement: To be consistent and to have the correct focus on training requirements, please reference Section H.

DOE-RL/FDH Response: Section H is complied with by directing the reader in Chapter 8 to Appendix 8A. Appendix 8A contains the Solid Waste Disposal training plan. This training plan is included in the 616 Nonradioactive Dangerous Waste Storage Facility (616 NRDWSF) Permit, which has been accepted by Ecology, and included in the HF RCRA Permit, Part III, Chapter 1.

36. Page 12, 1st para. under bullets. Comment: What happens with personnel who cannot pass the training requirements. Are they restricted from doing related work?

Requirement: Please clarify how training deficiencies are handled.

DOE-RL/FDH Response: Personnel are retested and/or provided with additional instruction. If the personnel cannot pass the required tests necessary to perform his/her job, this individual is (1) not allowed to perform this particular job or (2) is allowed to perform the job, but under close supervision (this depends on the hazards associated with the job).

37. Page 13, 1st sentence. Comment: Define exempt personnel.

Requirement: For clarification purposes, please define which positions are considered exempt.

DOE-RL/FDH Response: Refer to the Fair Labor Standard Act of 1964. This term does not infer that an employee does not have to meet specific requirements, but refers to how the human resources organization manages payroll.

38. Page 15, Section 5.11. Comment: How long is a person allowed to remain in the remedial training program, and what work restrictions are imposed on them during this time?

Requirement: Please answer questions.

DOE-RL/FDH Response: Remedial training program is determined by the individual's immediate manager/supervisor. Remedial training programs generally do not exceed 6 months; however, this is up to the immediate manager/supervisor.

39. Page A-1, 1st para. Comment: What process is in place for determining what type of training applies to a specific position?

Requirement: Clarify how this determination is made.

DOE-RL/FDH Response: This is an ongoing process. Any changes in operations are evaluated and a determination is made if additional, reduced, or no change is required. Personnel are then trained accordingly based on this ongoing evaluation.

40. Page A-2, Training Matrix. Comment: This table is confusing.

Requirement: Part of a project managers meeting will be devoted to discussion on how to use the table.

DOE-RL/FDH Response: No response required. Answers to questions will be developed during future discussions with Ecology.

41. Page A-12, Category G. Comment: The 40 hour and 16 hour Hazardous Waste Operations Training is considered "Non-RCRA," why?

Requirement: Clarify how this is categorized as "Non-RCRA."

DOE-RL/FDH Response: This training is required by OSHA and 29 CFR 1910.120 and not the dangerous waste regulations. This is Health and Safety training and not waste management training.

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